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January 28, 2014

Via ECF and Courtesy Copy to Chambers

Honorable Judge Joseph F. Bianco
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *AmGuard Insurance Company v. Country Plaza Associates Inc. d/b/a Cool Fish Restaurant, Tom Schaudel, Cool Fish Company, Inc. and Mark Scordo*
United States District Court, Eastern District of New York
Docket No.: 13 CV 5205 (JFB) (ARL)

Dear Judge Bianco:

This firm represents Plaintiff AmGuard Insurance Company (“AmGuard”) in the above-referenced matter. Pursuant to Your Honor’s individual rules, we write to respectfully request an adjournment of the pre-motion telephone conference scheduled for February 5, 2014 at 3:30 p.m. The undersigned has a conflict due to the conference previously scheduled in connection with the Hurricane Sandy cases, Docket No. 14 MC 00041. There have been no prior requests for an adjournment. This request is made on consent and for the convenience of the Court, we advise of the following joint availability – February 4, the morning of February 5 (until 12 p.m.) and February 6.

We thank the Court for its consideration.

Respectfully submitted,

s/Marci Goldstein Kokalas

Marci Goldstein Kokalas

cc: *Via ECF*
Matthew Putorti, Esq.
Anderson Kill P.C.
Attorneys for Defendants